

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE
CORPORATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Ref Docket No. ____

ORDER FURTHER EXTENDING DEADLINE WITHIN WHICH DEBTORS MAY REMOVE ACTIONS

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (the “Debtors”) and Tanya Meerovich, as the Liquidating Trustee for the FGMC Liquidating Trust (the “Liquidating Trustee”) for entry of an order (this “Order”) further extending the Removal Deadline for filing notices of removal of Actions by 60 days, up to and including February 28, 2024, without prejudice to the Debtors’ and the Liquidating Trustee’s right to seek further extensions; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors’ and the Liquidating Trustee’s notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number in the jurisdiction, were: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 13901 Midway Road, Suite 102-334, Dallas, TX 75244.

² A capitalized term used but not defined herein shall have the meaning ascribed to it in the Motion.

notice need be provided; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The Removal Deadline is extended through and including February 28, 2024.
3. This Order shall be without prejudice to the Debtors' and the Liquidating Trustee's right to request further extensions of the Removal Deadline.
4. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).
5. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.
6. The Debtors and the Liquidating Trustee are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
7. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.